

## **REMARKS**

Applicants respectfully request reconsideration of the present application in view of this response. Claims 1-26 are currently pending in the present application, and claims 23-24 and the specification have been amended. Applicants have also filed 4 Replacement Sheets of drawings including Replacement FIGs. 8A-8E. Claims 1, 8, 15, 22, and 23 are independent claims.

## **PRIORITY DOCUMENTS**

Applicants acknowledge and thank the Examiner for the acknowledgement of priority under 35 U.S.C. § 119, and further thank the Examiner for the acknowledgement of the receipt of all the necessary priority documents as shown in the Office Action Summary dated March 28, 2005.

## **INFORMATION DISCLOSURE STATEMENT**

Applicants acknowledge and thank the Examiner for the careful consideration of all of the references listed in the Information Disclosure Statement filed August 4, 2003, as indicated by the Examiner's signature on the form PTO-1449.

### **ALLOWABLE SUBJECT MATTER**

Applicants acknowledge and thank the Examiner for the indication of the allowable subject matter contained in claims 23 and 24. Further, Applicants have re-written claim 23 in independent form and as such, respectfully submit that claims 23 and 24 are in condition for allowance.

### **COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE**

Applicants appreciate and agree with the Examiner's allowance of claims 23 and 24. However, Applicants note that the Reasons for Allowance appear to paraphrase claims 23 and 24. However, Applicants submit that claims 23 and 24 should not be interpreted by the phraseology set forth by the Examiner in the Reasons for Allowance, but instead be interpreted by the limitations present therein.

### **SPECIFICATION**

Applicants acknowledge and thank the Examiner for the acknowledgement of Applicants' intent to incorporate the Korean Priority Document for the present application in its entirety.

Further, on page 2 of the outstanding Office Action, the Examiner requests the Applicants delete [0001], or provide an English translation of material being "incorporated in its entirety," that is not part of the U.S. application. However, Applicants respectfully disagree, and submit that no deletion or English translation is necessary.

Applicants respectfully submit that MPEP §201.13 Part G specifically authorizes the inclusion of paragraph [0001] (incorporation of a foreign

priority application by reference) to correct for omissions during US filing and translation errors, without raising an issue of new matter. Thus, Applicants submit that none of the requests made by the Examiner on page 2 of the outstanding Office Action (e.g., deletion and/or submission of an English translation) are necessary. See MPEP §201.13 Part G.

### **DRAWINGS**

On page 8 of the outstanding Office Action, the Examiner submits that there is an alleged "drawing problem" in FIGs. 8A-8E, and requests an explanation or correction.

Although, Applicants do not necessarily agree with the Examiner's submission, in an effort to expedite prosecution of the present application, Applicants have amended FIGs. 8A-8E by way of this response. Further, Applicants submit that no new matter has been added by way of the replacement figures 8A-8E.

### **CLAIM OBJECTIONS**

On page 7 of the outstanding Office Action, the Examiner has objected to claims 23 and 24 as allegedly lacking antecedent basis. More specifically, the Examiner submits that the "oxide dielectric layers" recited in independent claim 22 are referred to as "metal oxide layers", in claims 23 and 24.

Applicants have amended claims 23 and 24 taking into account the Examiner's suggestions and comments. Accordingly, Applicants respectfully request withdrawal of the above objection.

### **PRIOR ART REJECTIONS**

#### ***Claim Rejections under 35 U.S.C. §102(e)***

Claims 1-14 and 26 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Metzner et al. (U.S. Patent Publication No. 2003/0232511 A1, hereinafter referred to as "Metzner"). Applicants respectfully traverse this rejection.

On page 3 of the outstanding Office Action, the Examiner submits that paragraph [0011] of Metzner allegedly teaches "an ALD process using a precursor of TDEAH that forms a chemisorbed precursor layer on the substrate". However, Applicants respectfully disagree with the Examiner's conclusion.

Paragraph [0011] of Metzner discloses a pulsed atomic layer deposition process, in which a layer of TDEAH is adsorbed on a substrate surface at a temperature less than 220°C.

However, Metzner does not teach or suggest forming a "chemisorbed" layer, as set forth in claim 1, for example. Instead, at most, Metzner arguably discloses forming an adsorbed layer. Accordingly, Metzner, at most, teaches forming an adsorbed layer and not a "chemisorbed" layer, as set forth in claim 1, for example.

Further, with regard to claims 2-7, Applicants respectfully submit that claims 2-7 are also allowable for at least the reasons as discussed above with regard to claim 1, from which they depend.

With regard to independent claim 8, recites causing a portion of the precursor to "chemisorb", and as such, is allowable for at least reasons somewhat similar to discussed above with regard to claim 1.

With regard to claims 9 through 14, Applicants respectfully submit that claims 9-14 are also allowable for at least the reasons as discussed above with regard to claim 8, from which they depend.

### ***Claim Rejections under 35 U.S.C. §103(a)***

Claims 15-22 and 25 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Metzner in view of Basceri et al. (U.S. Patent No. 6,753,618 B2, hereinafter referred to as "Basceri"). Applicants respectfully traverse this rejection.

Initially, similar to that as discussed above with respect to claims 1 and 8, claims 15 and recite forming a "chemisorbed" layer, and as such, are allowable for at least reasons somewhat similar to those as discussed above with respect to at least one of claims 1 and 8.

On page 5 of the outstanding Office Action, the Examiner acknowledges that Metzner is silent with regard to any method for manufacturing a capacitor, and allegedly relies upon Basceri for teaching these limitations. However, Applicants respectfully submit that even assuming *arguendo* that Metzner could be combined with Basceri (which Applicants do not admit), Basceri would still fail to make up for at least the deficiencies of Metzner as discussed above with regard to claims 15 or 22. Accordingly, Applicants respectfully submit that neither Metzner nor Basceri, either alone or in combination, teach or suggest all of the limitations set forth in claims 15 or somewhat similarly in claim 22.

Further, with regard to claims 16-19 and 25-26, Applicants respectfully submit that these claims are also allowable for at least the reasons set forth above with regard to independent claims 15 and 22, respectively.

## **CONCLUSION**

In view of above remarks, reconsideration of the outstanding rejection and allowance of the pending claims is respectfully requested.

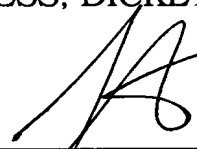
If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number listed below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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### **AMENDMENTS TO THE DRAWINGS**

The attached "Replacement Sheets" of drawings include changes to Figures 8A-8E. The attached "Replacement Sheets," which includes Figures 8A-8E, replaces original sheets including Figures 8A-8E.

Attachment: Replacement Sheets (4)